

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JACOB D. MILLER

Criminal No. 25-CR-30026-KAR

**AFFIDAVIT OF SPECIAL AGENT MICAYLA DAVIDSON IN SUPPORT OF
THE GOVERNMENT'S MOTION FOR DETENTION**

I, Mary Micayla Davidson, state:

Introduction and Agent Background

1. Since 2023, I have served as a Special Agent with the Federal Bureau of Investigation ("FBI"). As a Special Agent, I am responsible for the investigation of federal criminal offenses.

2. Since 2023, I have also been assigned to the FBI's Boston Division Springfield Resident Agency Joint Terrorism Task Force ("JTTF"). As a member of the JTTF, I work with agents and officers investigating crimes involving both domestic and international terrorism as well as national security violations.

3. I respectfully submit this Affidavit in further support of the Government's motion for pretrial detention of Jacob D. Miller ("Miller"). D.12.

4. The facts in this Affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show merely that there is a basis for the Government's motion for

pretrial detention and does not set forth all of my knowledge about this matter.

The Search of Miller's Residence on April 8, 2025

5. As set forth in the Affidavit of FBI Special Agent Dustin Farivar based in support of Miller's Criminal Complaint, D.4, and the Affidavit of FBI Special Agent Derek Boucher in support of the Government's motion for pretrial detention, D.14, on April 8, 2025, members of the FBI executed a search warrant for the Miller Residence.

6. During the execution of the search warrant, FBI agents located and seized numerous digital devices, including the following items:

- a. HP Laptop, Serial Number 5CD72669K4 (the "First HP Laptop");
- b. Black Samsung Phone, Serial Number R5CR115252X;
- c. Vaio Laptop, Serial Number 3000001;
- d. Black HP Laptop, Serial Number 5CDO033OJ;
- e. Apple iPad, model A1893, Serial Number DMPXL62BJF8K;
- f. Motorola Cell Phone FCCID IHDT56QA1; and
- g. Nokia Cell Phone, IMEI 358712919118784, Serial Number BD87D22LU

7. The First Laptop was located in the room labeled "B" by the FBI Search Team. Room "B" is immediately upon entry into the front door of the residence and contained a desk, chair, printer, wood stove, and couch. The First Laptop was located on the desk in the corner of room "B."

8. On April 16, 2025, FBI Special Agent Christopher Beckstrom performed a forensic extraction of the First HP Laptop.

9. On April 22, 2025, I began to review the First HP Laptop for evidence responsive

to the search warrant. I observed, among other things:

- a. An image file titled "\$RA24Q6T.jpg" with the following file path:
NER013752_1 SSD from B15.E01- Partition 3 (Microsoft NTFS, 919.04 GB)
Windows\Recycle.Bin\S-1-5-21-2197474319-2577647645-924715551-
1001\RA24Q6T.jpg. The image is of Miller's face from the neck up. Miller is
holding the front of his Massachusetts driver's license next to his face. The content
of the driver's license is clearly readable. The original image was created and
modified on 09/23/2024 at 10:06:21.

10. While conducting my review, I observed in plain view several images that appeared to depict child sexual abuse material ("CSAM"). I immediately contacted Assistant United States Attorney Steven H. Breslow, who advised me to cease my review of the First HP Laptop and all other digital devices until the Government could obtain a search warrant for evidence of the defendant's possession, receipt, distribution, and/or production of CSAM.

11. The following files¹ are the images of CSAM that I observed in plain view:²

- a. A thumbnail image file titled "7aa272f754509b3b.jpg," This file depicts a prepubescent female approximately 3 to 5 years old. The girl is standing in what appears to be a bedroom and visible from the waist up. The girl has long dirty blonde hair and is wearing a white t-shirt. The girl is performing oral sex on an adult male

¹ A disc containing copies of these files will be available for review by the Court and/or the defense upon request.

² All these files were in the following path: NER013752_1 SSD from B15.E01- Partition 3 (Microsoft NTFS, 919.04 GB) Windows\Users\jdmil\AppData\Local\Microsoft\Windows\Explorer\thumbcache_1280.db.

with the girl's right hand holding the erect adult male's penis. The adult male's face is not visible. The adult male is wearing a white t-shirt that he has pulled up above his belly button and blue pants which are un-zipped and un-buttoned.

b. A thumbnail image file titled "4741096b9da871dd.jpg." This file depicts a prepubescent female approximately 1 to 3 years old. The girl's face is not visible. The girl is wearing a gray shirt and is nude from the waist down. The girl is laying on her back with her legs in the air and out of frame. An adult male's erect penis is touching the outside of the girl's vagina.

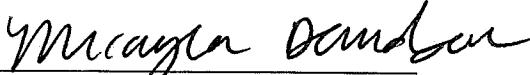
c. A thumbnail image file titled "3b935cec4d6de8ff.jpg." This file depicts a prepubescent female approximately 4 to 6 years old. The girl's face is visible. The girl has dark colored hair and is wearing a white Minnie Mouse bra. The girl is nude from the waist down with what appears to be her underwear pushed above her waist. The girl is laying on her back and using her arms to hold her legs in the air next to her shoulders. The girl's anus and vagina are visible.

d. A thumbnail image file titled "f29a8406115e0a79.jpg." The file depicts a prepubescent female approximately 5 to 7 years old. The girl's face is not visible. The girl is laying on her stomach with her arms and legs spread apart. The female had dark brown hair and is wearing what appears to be a black bra and black and pink underwear. The black and pink underwear is pushed to the side by an adult's hand, exposing the girl's vagina and anus.

12. The FBI's investigation into this matter, including the extent to which the defendant possessed, received, distributed, and/or produced CSAM, is continuing.

Conclusion

Sworn to under the pains and penalties of perjury,



Micayla Davidson
Special Agent, Federal Bureau of
Investigation

Dated: April 22, 2025